

AO 91 (Rev. 02/09) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the  
Southern District of TexasUnited States District Court  
Southern District of Texas  
FILED

JAN 31 2018

David J. Bradley, Clerk

United States of America  
v.  
Isaac PEREZ, U.S.C., YOB: 1977

Case No.

M-18-0224-M

Defendant

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of 01/30/2018 in the county of Starr in the Southern District of  
Texas, the defendant violated Title 18 U. S. C. § Section 922 (g)(1)  
, an offense described as follows:

The defendant(s), did knowingly and unlawfully possess any firearm or ammunition that had previously traveled in and affected interstate commerce, after being convicted in a court of law for a felony crime punishable by imprisonment for a term exceeding one year.

This criminal complaint is based on these facts:

SEE ATTACHMENT A

☒ Continued on the attached sheet.approved by  
1088 KSO

C. M. Delgado

Complainant's signature

Carlos M. Delgado, Jr, ATF Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date:

January 31, 2018  
8:38 am

Peter E. Ormsby

Judge's signature

City and state:

McAllen, TX

Peter E. Ormsby, U.S. Magistrate Judge

Printed name and title

---

**ATTACHMENT A**

---

This affidavit is in support of a criminal complaint charging Isaac PEREZ (hereinafter referred to as "PEREZ"), with the criminal violation set forth in Attachment A. The evidence available to me demonstrates that there is probable cause to believe that PEREZ has violated Title 18 U.S.C 922(g)(1) which provides as follows:

It shall be unlawful for any person who has been convicted in any court of, a crime punishable by imprisonment for a term exceeding one year, to receive, possess, or transport any firearm or ammunition in or affecting interstate or foreign commerce; or to receive any firearm or ammunition which has been shipped or transported in interstate or foreign commerce.

Further, the Affiant states as follows:

On January 30, 2018 your affiant and fellow ATF Special Agents (S/As) completed a consensual interview of Isaac PEREZ, a previously convicted felon, at his known residence in Roma, TX. Also listening in during the consensual interview was PEREZ's girlfriend. The consensual interview was in reference to an ongoing firearms investigation. During the interview, PEREZ stated he was currently in possession of a firearm which was stored in a closet which PEREZ had access to. PEREZ added he lived in the residence and had his belongings in the residence but did not own the residence. PEREZ advised S/As they would have to get consent to search from the owner of the residence, PEREZ's girlfriend. ATF S/As approached PEREZ's girlfriend and she subsequently provided consent and allowed S/As to search her residence. ATF S/A Summers retrieved the firearm from the room mentioned by PEREZ and observed ammunition in plain view on a bed room dresser, in close proximity to the rifle. The ammunition was determined to be 42 rounds of assorted .22 LR ammunition (thirty-three (33) rounds of Remington, .22 LR ammunition / five (5) rounds of Eley, .22 LR ammunition / four (4) rounds of Federal, .22 LR ammunition) which was seized.

Prior to interviewing PEREZ, and also on the aforementioned date, your affiant obtained a criminal history for PEREZ. The result of the query revealed that PEREZ was convicted of Arson on July 19, 2010 in the 281st District Court of Starr County, TX, a felony punishable by a term of imprisonment exceeding 1 year. Also prior to interviewing PEREZ, your affiant received a certified copy of the Judgment of Conviction by Court listing PEREZ's aforementioned conviction.

On the same date, your affiant, who is a recognized expert in the interstate and foreign commerce travel of firearms and ammunition examined the ammunition possessed by PEREZ. Your affiant stated the ammunition was manufactured outside of the State of Texas.

Based on the above information, your affiant believes Isaac PEREZ, was in possession of the above mentioned ammunition in violation of Title 18, United States Code, Section 922(g)(1), on January 30, 2018, in Starr County, Texas.